

UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION (DETROIT)

In re:

CITY OF DETROIT, MICHIGAN
Debtor.

Chapter 9
Case No. 13-53846-swr
Hon. Steven W. Rhodes

**CONCURRENCE OF THE RETIREE ASSOCIATION PARTIES
IN THE CITY OF DETROIT'S MOTION FOR ENTRY OF A PROTECTIVE
ORDER STRIKING SYNCORA'S DEMAND IN ITS RULE 30(b)(6)
DEPOSITION NOTICE FOR THE PERSONAL FINANCIAL INFORMATION
OF ALL CITY RETIREES (Dkt. 5442)**

The Retired Detroit Police & Fire Fighters Association (“RDPFFA”), Donald Taylor, individually, and as President of the RDPFFA, and the Detroit Retired City Employees Association (“DRCEA”) and Shirley V. Lightsey, individually, and as President of the DRCEA (collectively “Retiree Association Parties”), through their counsel, Lippitt O’Keefe Gornbein, PLLC and Silverman & Morris, P.L.L.C., concur in the City of Detroit’s Motion for Entry of a Protective Order Striking Syncora’s Demand in its Rule 30(b)(6) Deposition Notice for the Personal Financial Information of All City Retirees (“Motion”) (Dkt. 5442). The Retiree Association Parties also concur in the joinder filed by the Official Committee of Retirees (Dkt. 5470), and the statement filed by the Attorney General (Dkt. 5490), and incorporate the arguments set forth in each document referenced as if fully restated herein by the Retiree Association Parties.

WHEREFORE, the Retiree Association Parties respectfully request that the Court grant the relief requested by the City in its Motion.

Respectfully submitted,

By: /s/ Karin F. Avery
SILVERMAN & MORRIS, P.L.L.C.
Thomas R. Morris (P39141)
Karin F. Avery (P45364)
30500 Northwestern Hwy., Suite 200
Farmington Hills, Michigan 48334
Tel: (248) 539-1330; Fax: (248) 539-1355
morris@silvermanmorris.com
avery@silvermanmorris.com

LIPPITT O'KEEFE GORNBEIN, PLLC
Brian D. O'Keefe (P39603)
Ryan C. Plecha (P71957)
370 East Maple Road, 3rd Floor
Birmingham, Michigan 48009
Tel: (248) 646-8292; Fax: (248) 646-8375
bokeefe@lippittokeefe.com
rplecha@lippittokeefe.com

Attorneys for Retiree Association Parties

Dated: June 23, 2014